

MEMO ENDORSED



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January 5, 2024

Via ECF; Total Pages: 2

Hon. Jessica G. L. Clarke, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Balbuena Rueda et al v. 980 Columbus Food Corp. et al
Docket No. 1:22-cv-09587-JGLC

Dear Judge Clarke:

This firm represents defendants 980 Columbus Food Corp. d/b/a Ranch Deli, Anwar Alokam, and Adal Mosad Saleh a/k/a Ali Saleh (“Defendants”) in the above referenced matter. On December 28, 2023, Your Honor issued a Memo Endorsement which scheduled an in-person Post-Discovery Conference on February 2, 2024, at 12:00 p.m.

This letter is written jointly with Plaintiff to respectfully request an adjournment pursuant to Paragraph 2(e) of Your Honor’s Individual Rules seeking (1) an adjournment of the Post-Discovery Conference date, and (2) conversion of the in person Post-Discovery Conference to a phone or Zoom conference. I have conferred with Plaintiff’s counsel, and he consents to this request. This is the first request to adjourn the conference and convert it to a telephone or a Zoom conference.

The reason for this request is that I have a conflicting deposition scheduled on that date, which is difficult to reschedule. The parties jointly request a phone or Zoom conference to reduce legal fees and costs for the parties. Pursuant to Your Honor’s Individual Rules, the parties respectfully submit the following three mutually agreeable alternative conference dates for your consideration: February 16, 2024, February 27, 2024, and February 29, 2024 (all dates available in the morning and afternoon). The

requested adjournment will not affect any other scheduled dates for this matter.

Thank you for your kind consideration and courtesies as to this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Michael K. Chong". The signature is written in a cursive, flowing style.

Michael K. Chong, Esq.

Application GRANTED in part and DENIED in part. The conference in this matter, previously scheduled for February 2, 2024 at 12:00 p.m., is RESCHEDULED for **February 29, 2024 at 3:00 p.m.** The conference will be held in person, in Courtroom 20C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York. The parties shall submit a post-discovery joint status letter, as outlined in Section 3(d) of the Court's Individual Rules and Practices in Civil Cases, by **February 22, 2024.**

SO ORDERED.

A handwritten signature in blue ink that reads "Jessica Clarke". The signature is written in a cursive, flowing style.

JESSICA G. L. CLARKE
United States District Judge

Dated: January 9, 2024
New York, New York

MKC/lk

cc: Jarret Thomas Bodo, Esq.
Catalina Sojo, Esq. (*Via ECF*)